

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RLI INSURANCE COMPANY	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
vs.	:	NO. 05 858 (JFF)
	:	
INDIAN RIVER SCHOOL DISTRICT,	:	
EDiS COMPANY and	:	JURY TRIAL DEMAND
BECKER MORGAN GROUP, INC.	:	
	:	
Defendants.	:	

**PLAINTIFF RLI INSURANCE COMPANY'S NOTICE OF MOTION
TO COMPEL THE DE BENE ESSE DEPOSITION OF CHRISTIAN McCONE**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on Friday, July 11, 2008, at 2:00 p.m. or as soon thereafter as counsel may be heard, the undersigned counsel, Perry F. Goldlust, Esquire and Harry R. Blackburn, Esquire, of the law firm of Blackburn, DeClement & Associates, P.C., will move before the United States District Court for the District of Delaware for an Order compelling the *de bene esse* trial deposition of Christian McCone, employee of EDiS Company.

In support of this application, counsel will rely upon the Brief filed with this Notice of Motion.

Respectfully submitted:

Law Offices of Perry F. Goldlust, P.A.

/s/ Perry F. Goldlust
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Attorneys for Plaintiff RLI Insurance Company

DATE: June 13, 2008

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